

EXHIBIT 7

Claimant
H Tsiattalou
16th / 12th / 11th
Exhibit HT16
Dated 12 January 2023

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No. QB-2020-000322

BETWEEN:

KARAM SALAH AL DIN AWNI AL SADEQ

Claimant

- and -

**(1) DECHERT LLP
(2) NEIL GERRARD
(3) DAVID HUGHES
(4) CAROLINE BLACK**

Defendants

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No. QB-2020-002492

BETWEEN:

STOKOE PARTNERSHIP SOLICITORS

Claimant

- and -

**(5) DECHERT LLP
(6) MR DAVID NEIL GERRARD**

Defendants

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No. QB-2020-003142

BETWEEN:

JIHAD ABDUL QADER SALEH QUZMAR

Claimant

- and -

**(1) DECHERT LLP
(2) NEIL GERRARD**

Defendants

Exhibit HT16

This is the exhibit marked "HT16" to the witness statement of Haralambos Tsiattalou dated 12 January 2023.

Instructed By: Stokoe Partnership Solicitors
Second Floor
1 – 3 Staple Inn
Holborn
London
WC1V 7QH

Client Reference: Reference: AWN001/003/BT

SUMMARY REPORT

of

MICHAEL GEORGE

Diligence Intl Ltd

3rd Floor, 1 Ely Place

Farringdon

London

EC1N 6RY

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BACKGROUND

1. This report relates to Stokoe Partnership Solicitors client reference AWN001/003/BT.
2. On the 14th July 2022, Jessica Sarwat of Stokoe Partnership Solicitors delivered to Diligence Intl Ltd the following items:

Description
<p>One (1) Seagate portable drive S/N: NAASFRFT labelled 'USB & JB MBA'</p> <div data-bbox="507 618 1102 1025">  </div>
<p>One (1) x Aegis Padlock 3 A25-3PL256-1000 labelled 'Client'</p> <div data-bbox="507 1106 1086 1469">  </div>
<p>One (1) x Huawei Matebook S/N: EHUBB18C10000878 labelled 'P-SH'</p> <div data-bbox="427 1559 1174 1899">  </div>

3. The above items were subsequently logged and identified with the following references:

Exhibit Ref.	Description	Sealed As
DFS / 1187	One (1) Seagate portable drive S/N: NAASFRFT labelled 'USB & JB MBA'	E212265
DFS / 1188	One (1) x Aegis Padlock 3 A25-3PL256-1000 Labelled 'Client'	E212266
DFS / 1189	One (1) x Huawei Matebook S/N: EHUBB18C10000878 labelled 'P-SH'	E212267

4. On 28th October 2022, Diligence Intl Ltd received instruction from Stokoe Partnership Solicitors to:

- a) Create a forensic working images or images by non-destructive means in accordance with current best forensic practice guidelines.
- b) Examine these images to the extent necessary to establish the ownership of the devices.
- c) If and to the extent that the ownership of any device is not clear, they should proceed to try to determine the user(s) of the data on the devices.
- d) If the objective of identifying the owner(s) of the devices or user(s) of the data cannot be achieved without reviewing the content of any file or data sets, Diligence will produce a list of the content of the devices, halt the process, and revert to Stokoe for further instruction.

EXAMINATION OF DEVICES

DEVICE DFS/1187

5. DFS/1187 is a portable USB drive device detailed as follows:

Device Details: DFS/1187	
Make	Seagate Expansion Portable Drive
Model	SRD0NF1
P/N	1TEAP6-500
S/N	NAASFRFT
Capacity	2TB

6. Using forensic processes and techniques, a forensic image of the above Seagate portable drive was completed using a Logicube Writeprotect Portable write blocker and imaging software FTK Imager v4.3.0.18 resulting in a verified bit-for-bit copy.
7. I produced the following copies of the above Seagate drive DFS/1187.
 - Master Copy - DFS1187_MAG_MC1
 - Working Copy 1 - DFS1187_MAG_WC1
 - Working Copy 2 - DFS1187_MAG_WC2
8. Examination of the physical device did not establish the ownership of this device or the user(s) of the data. The creation of data on the device ranges between October 2009 and August 2020.
9. Examination of file header information identified data on the device which may help to identify potential owner(s) & user(s).
10. In order to identify potential user(s) we looked for the presence of any e-mail accounts or references to email addresses. The following email accounts were identified with a date range of October 2009 to November 2019.

Source Folder: ST-MBA13		eMail Account Reference
Filename:	571715.sqlite	jamie.buchanan@msn.com jamie@rakdev.ae

11. The label on the front of this device contains the wording 'USB & JB MBA' and together with the above identified email addresses, supports that the content of the drive may relate to a person called 'Jamie Buchanan' in some way.

DEVICE DFS/1188

12. DFS/1188 is a portable USB with a built in keypad detailed as follows:

Device Details: DFS/1188	
Make / Model	Apricorn Aegis Padlock 3
Serial No.	P1T036356
Size	1TB
Encryption	256 AES XTS

13. To access this device a six to sixteen-digit PIN code is required to be entered into a keypad located on the front of the drive to access the encrypted data contained therein.
14. According to the 'Apricorn' manufacturer's user manual¹, after up to ten unsuccessful attempts to enter the PIN Code the keypad will lock, after which the drive will assume that it is under brute force attack and automatically delete all of its data.
15. Powering up the device displays a solid red LED which indicates that the drive is locked and is awaiting PIN code entry.
16. Because of the security feature enabled on this device it was not possible to access the data to establish the ownership of this device or the user(s) of the data, no further action was taken on this device.

DEVICE DFS/1189

17. DFS/1189 is a Huawei Matebook laptop containing one (1) solid state drive (SSD) device detailed as follows:

Device Details: DFS/1189	
Make / Model	Huawei Matebook Mach – W29
Serial No.	2018AP0990
SSD Details	
Make / Model	Samsung MZ – VLB5120
P/N	MZVLB512HAJQ-00000
S/N	S3W8NX0KB03735
Manufacture Date	November 2018
Capacity	512GB

18. Using forensic processes and techniques, a forensic image of the above Samsung drive was completed using a Logicube Writeprotect Portable write blocker and imaging software FTK Imager v4.3.0.18 resulting in a verified bit-for-bit copy.
19. I produced the following copies of the above Samsung drive removed from the Huawei Matebook DFS/1189:

¹ https://apricorn.com/content/product_pdf/aegis_padlock/usb_3.0/Aegis_Padlock_3_Manual_sept2022.pdf

- Master Copy – DFS1189_MAG_MC1
- Working Copy 1 – DFS1189_MAG_WC1
- Working Copy 2 – DFS1189_MAG_WC2

20. Initial Examination of the physical device did not establish the ownership of this device or the user(s) of the data. Data on the device ranges between March 2011 and May 2021.
21. 'Windows Registry' files contain user registered details which may assist in determining the device ownership:

Source Files: System32/config/SAM & System32/config/SOFTWARE	
Computer Name	SANTA-HU
Owner	NdR
Operating System	Windows 10
Time Zone	Time Zone: W. Europe Standard Time
Username	NdR
Login Count	83

22. eMail headers contain the above computer name 'Santa-Hu' which is associated with the following eMail address:
- Nick del Rosso - ndr99@email.com
23. Further email addresses were also identified on the device:
- Nick del Rosso - ndr100@usa.com
 - Nick del Rosso - ndr@vitalmanage.com
 - Leo del Rosso - ndr100@usa.com
 - Leo del Rosso (Banking Division) - leo@acceptances.co.uk
24. The username referenced in the Windows registry together with the email header information and other email addresses identified indicate that 'NDR' may relate to a 'Nick Del Rosso'.
25. We also identified a file called 'smm@milopc.com as part of a update24Jan.rar'. This file appears to be a backup file of an email account. A 'Google' search of 'smm@milopc.com' indicates that it relates to a person named Mr Scott Michael Moore within a law firm called 'Moore International Law PLLC' based in New York.
26. The label on the front of this device contains the wording 'P-SH', it is possible that the letters 'SH' may refer to 'Santa HU'.

27. Examination of file header information identified potential owner(s) & user(s) of the device.

CONCLUSIONS

28. Because of the security features enabled on the 'Apricorn Aegis Padlock' USB (DFS1188), it has not been possible to identify the owner or user of the device.
29. It has not been possible to definitively identify the owner of the Seagate portable drive (DFS1187), however the device contains backups or copies of emails relating to 'Jamie.buchanan@msm.com' and 'Jamie@rakdev.ae', and the external label 'USB and JB MBA', suggesting the device is in some way linked to a 'Jamie Buchanan'. The email data represents only part of the total data available.
30. It has not been possible to definitively identify the owner of the Huawei laptop (DFS1189) given it contains multiple e-mail addresses within it, however the data appears to be in some way related to both a 'Scott Michael Moore' and a 'Nick Del Rosso'.
31. Excel spreadsheets of the file headers containing potential user identifiers for both devices (DFS1187 and DFS1189) is available on request, in total they contain over 21,000 file header IDs.
32. We also note that there is similar white labelling adhered to each of the devices which appear to be additional to manufacture labels.



Senior Forensic Investigator – Digital Forensics

Diligence Intl Ltd

Date: 12th January 2023

GENERAL COMMENT

To the best of my knowledge and belief, there are no reasonable grounds for believing that the evidence produced and identified in my report is inaccurate because of improper use of the examining computers.

All computer examinations referred to in this report were carried out in accordance with the 'Association of Chief Police Officers Good Practice Guide for Computer Based Electronic Evidence'.

The accuracy of any timestamps associated with the creation of files, will be dependent on the accuracy of the internal clock of the device that recorded those timestamps. Any dates and times are reported as found.

I reserve the right to amend my opinion should additional data or further information be made available.

I confirm that I have read and understand my duties in relation to the requirements of Part 35 of the Civil Procedure Rules and a signed declaration to that effect is appended to this report.

Although instructions were received from Stokoe Partnership Solicitors, this report is prepared for Court purposes if required.

DISCLOSURE

No methods reported are yet accredited to ISO 17025 but Diligence Intl Ltd work to established and well proven technical procedures and are working towards accreditation. To mitigate any risk of non-accreditation to ISO17025, Diligence Intl Ltd. relies on extensive subject matter experience and operates a quality management system that is accredited to ISO9001:2015 and a security management system that is accredited to ISO27001:2013.

STATEMENT OF TRUTH

I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

If any facts subsequently emerge which render any part of this report untrue, I will circulate the fact and all changes to all relevant parties forthwith.

I understand that my primary duty is to the Court when preparing written reports and giving evidence and I have complied and will continue to comply with that duty.

I believe my report to be accurate; it covers the issues raised by my instructions and reflects my views as an independent expert.

Where relevant my report includes any information of which I have knowledge, or of which I have been made aware, that might adversely affect the validity of my conclusions.

I have indicated any sources of information upon which I have relied in my report.

Those instructing me will be informed immediately, with written confirmation, if my existing report requires correction or qualification.

I understand that my report, subject to any corrections before swearing as to its veracity, will form the evidence to be given under oath.

I understand that an expert may assist any cross-examination on my report.

I confirm that I have not entered any arrangement whereby the amount or payment of my fees is in any way dependent on the outcome of the case.

CIVIL DECLARATION

I understand that my overriding duty is to the Court, and I have complied with that duty. I am aware of the requirements of CPR Part 35, its practice direction and the CJC Guidance for the instruction of experts in civil claims.

I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

PROFILE

I am a Senior Forensic Investigator at Diligence Intl Ltd and since 1994 I have been directly involved in the investigation and examination of digital data for forensic purposes. I have been trained in data extraction and have considerable experience in using various approved hardware and software tools such as Encase, FTK, XRY, XACT, and a certified Mac Forensic (CMFS) specialist.

I am City & Guilds accredited in CSAS for investigators & analysts, a qualified and approved mobile phone & SIM card examiner, and have been trained in the use of various examination and data extraction equipment and programmes.

I am listed in the UK Register of Expert Witnesses and I have provided expertise and support in a great many criminal and civil cases, for both prosecution and defence, including corporate and commercial investigations



Senior Forensic Investigator – Digital Forensics

Diligence Intl Ltd

Date: 12th January 2023